

Amanda Katzenstein, Esq. (VBN #82273)
POLSINELLI LLP
Three Embarcadero Center, Suite 1350
San Francisco, CA 94111
(415) 248-2100

*Counsel for certain Lender Trusts and their
Special Servicer, KeyBank National Association*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:)	Chapter 11
)	
CIRCUIT CITY STORES, INC., et al.,)	Case No. 08-35653-KRH
)	
Debtors.)	Jointly Administered

**NOTICE OF INTENT TO ATTEND HEARINGS
Docket Nos. 13955, 13959, and 13961**

The below listed Lender Trusts (*see Exhibit A*) will appear by and through their counsel, Robert J.E. Edwards, and will attend the hearings noticed herein as Docket Nos. 13955, 13959, and 13961. The Lender Trusts do not oppose the noticed relief sought by the Liquidating Trust in the hearings but will participate to the extent necessary to demonstrate as follows:

Dkt. No. 13955 (Claim No. 9721) – Lender Trust No. 2 was the secured lender for the landlord of the property at issue in Claim No. 9721. Pursuant to a Deed in Lieu Agreement between Lender Trust No. 2 and landlord, landlord assigned all rights it may have had to any claims concerning the property at issue to Lender Trust No. 2.

Dkt. No. 13956 (Claim No. 9724) – Lender Trust No. 2 was the secured lender for the landlord of the property at issue in Claim No. 9724. Lender Trust No. 2 has since foreclosed on the property at issue. Pursuant to the loan documents between Lender Trust No. 2 and landlord, landlord is the proper holder of the claim concerning the property at issue.

Dkt. No. 13961 (Claim No. 15019) – Lender Trust No. 3 was the secured lender for the landlord of the property at issue in Claim No. 15019. Pursuant to a Settlement Agreement between Lender Trust No. 2 and landlord, landlord assigned all rights it may have had to any claims concerning the property at issue to Lender Trust No. 3.

Dated: December 9, 2016

Respectfully submitted,

POLSINELLI LLP

By: /s/ Amanda Katzenstein
AMANDA KATZENSTEIN (VBN #82273)
Three Embarcadero Center, Suite 1350
San Francisco, CA 94111
(415) 248-2100
Fax No. (415) 248-2101
akatzenstein@polsinelli.com

POLSINELLI PC

ANDREW J. NAZAR (admitted *pro hac vice*)
ROBERT J.E. EDWARDS (*pro hac* pending)
900 West 48th Place, Suite 900
Kansas City, Missouri 64112
(816) 753-1000
Fax No. (816) 753-1536
anazar@polsinelli.com
redwards@polsinelli.com

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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of December 2016, a true and correct copy of the foregoing *Motion for Admission Pro Hac Vice* was filed using the Court's CM/ECF system that sent notice of such filing to counsel for the Debtors, Liquidating Trust, U.S. Trustee, and all interested parties by ECF notification from the Court

/s/ Amanda Katzenstein

Exhibit A

LENDER TRUSTS

1. U.S. Bank National Association, as trustee for the registered holders of GMAC Commercial Mortgage Securities, Inc., Mortgage Pass-Through Certificates, Series 1997-C1.
2. U.S. Bank National Association, as trustee for the registered holders of GMAC Commercial Mortgage Securities, Inc., Mortgage Pass-Through Certificates, Series 1998-C2.
3. Wells Fargo Bank, N.A., successor by merger to Wells Fargo Bank Minnesota, N.A. f/k/a Norwest Bank Minnesota, N.A. as trustee for the registered holders of Merrill Lynch Mortgage Investors, Inc., Mortgage Pass-Through Certificates, Series 1998-C1-CLT.